

**LEGAL PROCESSING DIVISION
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BRANCH**

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Docket: IRS-2010-0010

Group Health Plans and Health Insurance Coverage Rules Relating to Status as a Grandfathered Health Plan Under the Patient Protection and Affordable Care Act

Comment On: IRS-2010-0010-0002

Group Health Plans and Health Insurance Coverage: Status as Grandfathered Health Plan under the Patient Protection and Affordable Care Act; Cross-Reference

Document: IRS-2010-0010-0041

Comment on FR Doc # 2010-14487

Submitter Information**Name:** Unknown 5

General Comment

Please see attached example of four health plan designs with HRA components. If the insurance plan does not make changes and qualifies as grandfathered, but the HRA plan changed and reduced deductible reimbursement will the insurance plan lose grandfathered status?

Attachments**IRS-2010-0010-0041.1:** Comment on FR Doc # 2010-14487

	Client #1	Client #2	Client #3
Deductible/Coinsurance Purchased from Carrier	\$6,000 / \$12,000 Deductible 80% Coinsurance Max OOP \$1,500 / \$3,000	\$3,500 / \$3,500 QHDHP Coinsurance Max OOP \$5,200 / \$5,200	\$4,000 / \$8,000 Deductible 100% Coinsurance
Employee Portion of Deductible / Coinsurance	\$0 Deductible / \$0 Coinsurance	\$500 / \$1,000 Deductible	1st \$250 / \$500 of Deductible 20% of remaining \$3,750 / \$7,500 Deductible or \$750 / \$1,500 TOTAL \$1,000 / \$2,000
Employer Portion of Deductible / Coinsurance	\$6,000 / \$12,000 Deductible 80% Coinsurance Max OOP \$1,500 / \$3,000	\$3,000 / \$2,500 Deductible	80% of remaining \$3,750 / \$7,500 Deductible or \$3,000 / \$6,000 TOTAL \$3,000 / \$6,000
Reimbursement Administrator	Standalone (employees submit HRA claims manually)	Integrated with insurance plan	Standalone (employees submit HRA claims manually)
Notes		This is a QHDHP administered 100% as an HRA. No HSA attached	
Questions	Please review the 4 client examples provided above. In all cases, if the insurance plan does not make the granddaddy test, the HRA plan changed, and reduced deductible reimbursement. Will the insurance plan		

Client #4

\$2,500 / \$5,000 QHDHP
80% Coinsurance
Max OOP \$5,000 / \$10,000

Deductible paired w/HSA Account

ER funds HSA \$1,000 / \$2,000
ER Reimburses 100% of
Coinsurance as an HRA

Standalone (employees submit
HRA claims manually)

This is a QHDHP administered as
an HSA for the Deductible portion
and an HRA for the coinsurance
portion

Questions and queries as
to the status of an individual status